

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

<b>WSOU INVESTMENTS, LLC D/B/A</b>	§	
<b>BRAZOS LICENSING AND</b>	§	<b>CIVIL ACTION 6:20-cv-00454-ADA</b>
<b>DEVELOPMENT,</b>	§	<b>CIVIL ACTION 6:20-cv-00455-ADA</b>
<i>Plaintiff,</i>	§	<b>CIVIL ACTION 6:20-cv-00456-ADA</b>
	§	<b>CIVIL ACTION 6:20-cv-00457-ADA</b>
	§	<b>CIVIL ACTION 6:20-cv-00458-ADA</b>
	§	<b>CIVIL ACTION 6:20-cv-00459-ADA</b>
<b>v.</b>	§	<b>CIVIL ACTION 6:20-cv-00460-ADA</b>
	§	<b>CIVIL ACTION 6:20-cv-00461-ADA</b>
	§	<b>CIVIL ACTION 6:20-cv-00462-ADA</b>
	§	<b>CIVIL ACTION 6:20-cv-00463-ADA</b>
<b>MICROSOFT CORPORATION,</b>	§	<b>CIVIL ACTION 6:20-cv-00464-ADA</b>
<i>Defendant.</i>	§	<b>CIVIL ACTION 6:20-cv-00465-ADA</b>

**DECLARATION OF SANDY PARK IN SUPPORT OF MICROSOFT  
CORPORATION'S MOTION TO TRANSFER VENUE TO AUSTIN DIVISION**

I, Sandy Park, declare as follows:

1. I am employed as a Director, Western United States in the Real Estate & Facilities group at Microsoft Corporation (“Microsoft”) and in that role I oversee real estate planning, leasing, and day to day operations of Microsoft facilities on the West Coast and in Texas. I have been employed by Microsoft since 1997.

2. I submit this declaration in support of Microsoft’s Motion for Intra-District Transfer to the Austin Division of the Western District of Texas in the above-captioned litigation. Unless otherwise indicated, the statements in this declaration are based upon my personal knowledge and/or based on corporate records maintained by Microsoft in the ordinary course of business.

3. I have been informed and understand that Plaintiff WSOU Investments LLC (“Plaintiff”) has filed the above-captioned patent infringement lawsuit against Microsoft in the Waco Division of the Western District of Texas. I am further informed and understand that the Waco Division of the Western District includes the following counties: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell.

4. Microsoft’s main Austin, Texas location is at 10900 Stonelake Boulevard, Suite 225, Austin, TX, 78759 (“the 10900 facility”). The 10900 facility is approximately 20,000 square feet and comprises one floor of a multi-tenant building. Microsoft has been leasing space at the 10900 facility since 2009. The 10900 facility is primarily a regional sales office. In addition to sales personnel, the 10900 facility also hosts members of other groups whose primary function is to support Regional Sales efforts and any other employees or functions in the area. Personnel in those other groups include Enterprise Sales & Support;

Search Advertising Sales; Support Engineers; Corporate, External, and Legal Affairs; and Finance personnel.<sup>1</sup>

5. The 10900 facility is secured and is accessible only to those with a Microsoft employee badge or authorized visitors. Access to the 10900 facility is available to visiting Microsoft employees upon request and has previously and regularly been used to host employees in need of temporary work space when visiting Austin. Visiting Microsoft employees may request access to the 10900 facility through an internal Microsoft security webpage. The 10900 facility includes shared space to host outside visitors and separately secured Microsoft employee-only space.

6. Under non-COVID-19 conditions, approximately 50 visitors may be hosted at the 10900 facility at a given time. Visiting Microsoft employees may reserve a “hot desk” style workstation and also make use of the facilities’ phone and focus rooms. Visiting employees may also use conference rooms and audiovisual systems.

7. Visiting employees to the 10900 facility have full access to Microsoft’s corporate high speed internet connection and Microsoft’s private Corporate Network, which was installed into the facility. Visiting employees can use the office’s networked printers and scanners. In-person IT support can be dispatched to the office if online support does not solve the visiting employee’s IT issue. Facilities, reception, and other support staff are available to assist visiting employees during business hours.

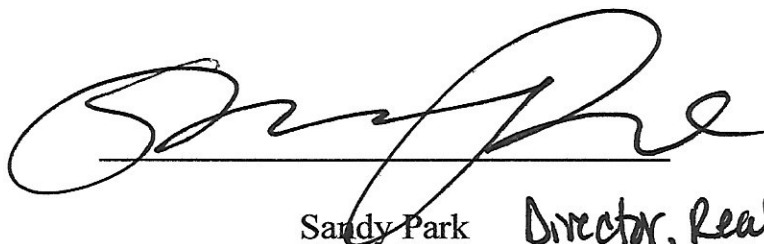
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<sup>1</sup> Due to COVID-19, the presence of employees on-site is currently more limited and restricted. My expectation is that after COVID-19 restrictions are lifted, the office will continue to be used as it was normally used prior to the pandemic.

8. Microsoft does not have any office space in Waco or the counties that make up the Waco Division.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct .

Executed on October 1, 2020 in Denver, Colorado.

A handwritten signature in black ink, appearing to read "Sandy Park", written over a horizontal line.

Sandy Park

Director, Real Estate &  
Facilities - West Region  
Microsoft Corporation